

CRAIG D. ROBINS

ATTORNEY AT LAW

35 PINELAWN ROAD, SUITE 106-E
MELVILLE, NEW YORK 11747
TEL (516) 496-0800
FAX (516) 682-4775
www.BankruptcyCanHelp.com
www.LongIslandBankruptcyBlog.com

June 22, 2022
via ECF

Hon. Chief Judge Alan S. Trust
United States Bankruptcy Court
Eastern District of New York
Alfonse M. D'Amato Federal Courthouse
290 Federal Plaza
Central Islip, New York 11722

Re: Brickchurch Enterprises, Inc.
Chapter 11
Case No. 22-70914-ast

Dear Honorable Chief Judge Trust:

I am the attorney for debtor, Brickchurch Enterprises, Inc. ("Debtor"). Debtor advised me that it desires to have new counsel, Camisha L. Simmons, Esq., of Simmons Legal PLLC, replace me as Debtor's counsel. Ms. Simmons indicated that she would file her retention application by tomorrow.

Ms. Simmons and I have had several discussions and I will be working with Ms. Simmons to ensure a smooth and orderly transition.

At the prior case management status conference, your Honor directed Debtor to file bidding procedures by today. In light of the fact that incoming counsel will be quickly taking over Debtor's representation, I respectfully request the Court extend Debtor's time to file the Bidding Procedures. I have provided a draft copy of the bidding procedures I prepared, as well as a draft copy of the plan and disclosure statement, to Ms. Simmons.

I would also like to point out that Debtor is seeking alternative avenues to reach a satisfactory conclusion to this Chapter 11 case. If your Honor recalls, Debtor is the owner of an oceanfront luxury residential estate located at 366 Gin Lane, Southampton.

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The estate boasts 11,000 square feet of living space, nine bedrooms and nine bathrooms. It sits on 2.05 acres of land. As of the petition date, the oceanfront estate was worth approximately \$63 million.

Adjacent to the oceanfront estate is another luxury estate located at 367 Gin Lane. The adjacent luxury estate is owned by Aberdeen Enterprises, Inc. Louise Blouin, Debtor's director, is the ultimate owner of both properties.

Debtor and Ms. Blouin are seeking to sell one or both properties, preferably in a private sale, but possibly in a public sale, with the objective of raising sufficient funds to satisfy the existing mortgage held by several entities collectively known as JGB.

The outstanding amount of the JGB mortgage is approximately \$43 million. Selling the Debtor's property in a private sale would likely maximize the value of the proceeds that can be realized. However, procuring a buyer at maximum value could take more time than a public sale. Debtor and Ms. Blouin retained Sotheby's International Realty prior to filing. I prepared a broker's retention application that would have been filed but for a recent revision to the broker's agreement. Ms. Simmons will finalize the broker's retention application within the next few days. The broker has been actively marketing the property.

Alternatively, Debtor and Ms. Blouin are actively and currently seeking financing of one or both properties in an effort to procure sufficient funds to satisfy the JGB mortgage. Doing so would enable Debtor to successfully exit this case as the JGB mortgage consists of more than 99% of all of Debtor's claims, excluding Ms. Blouin's personal claim as an equity interest holder. Of course, such refinancing would eliminate the need to sell Debtor's property.

For the above reasons, I respectfully submit that it is reasonable to extend Debtor's time to file bidding procedures. Ms. Simmons, as incoming counsel, will address the Court further on these issues at the next case management status conference currently scheduled for June 29, 2022.

I am cc'ing those individuals who appeared at the prior conference. I also conferred with U.S. Trustee trial attorney William Birmingham this afternoon by telephone to advise him. Thank you for your courtesies in this matter.

Sincerely yours,

/s/ Craig D. Robins

Craig D. Robins, Esq.

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cc: (*via email*)

Martha Wyrick, Esq.
Richard Kanowitz, Esq.
Gregory Kramer, Esq.
Leslie Thorne, Esq.
Steven Fox, Esq.
Louise Blouin
William Birmingham, Esq.
Camisha L. Simmons, Esq.